

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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UNITED STATES OF AMERICA

v.

JOSEPH BAPTISTE

and

ROGER RICHARD BONCY,

Defendants

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No. 17-cr-10305-ADB

**GOVERNMENT’S MOTION *IN LIMINE* ON THE ADMISSIBILITY  
OF THE DEFENDANT’S SIGNED STATEMENT OF FACTS**

The United States moves this Court, for the reasons stated in the accompanying Memorandum of Law, for an order allowing the government to offer into evidence, and to discuss in its opening statement at trial, a statement of facts that the defendant Joseph Baptiste signed as part of a plea agreement that he later breached. The defendant’s plea agreement included a stipulation as to the admissibility of the defendant’s signed statement notwithstanding Federal Rule of Evidence 410. The statement itself is otherwise admissible under Federal Rule of Evidence 801(d)(2)(A).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/Kriss Basil  
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